

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S STATEMENT OF ADDITIONAL MATERIAL FACTS**

Defendants Lisa Helton and Tony Mays respectfully move, under Fed. R. Civ P. 6(b)(1)(A) and LR6.01(a), for a three-day extension of time, up to and including Friday, May 6, 2022, within which to file their Response to Plaintiff's Statement of Additional Material Facts (D.E. 201).

In support of this Motion, Defendants would show that there is good cause to grant the motion for the following reasons:

1. On April 13, 2022, Plaintiff filed his Statement of Additional Material Facts (D.E. 201), making Defendants' Response to that Statement of Additional Material Facts due on April 27, 2022.
2. On April 27, 2022, Defendants sought an unopposed one-day extension until April 28, 2022, to respond to Plaintiff's Statement of Additional Material Facts, which this Court granted. (D.E. 210, 211.)
3. On April 28, 2022, Defendants sought an unopposed extension of time until May 3, 2022, to respond to Plaintiff's Statement of Additional Material Facts. (D.E. 213.)

4. Defendants have been working diligently to respond but have recently become aware of information that requires them to delay the filing of this Response in order to ensure they are making accurate representations to the Court.
5. Counsel for Defendants have conferred with counsel for Plaintiff concerning this motion and counsel for Plaintiff has stated that he does not oppose this motion.

For the foregoing reasons, Defendants respectfully request that the Court grant a three-day extension of time up to and including May 6, 2022, within which Defendants may file their Response to Plaintiff's Statement of Additional Material Facts (D.E. 201.)

Respectfully submitted,

HERBERT H. SLATERY III
Attorney General and Reporter

s/ Rob Mitchell
ROB MITCHELL (32266)
Senior Assistant Attorney General
SCOTT C. SUTHERLAND (29013)
Deputy Attorney General
MIRANDA JONES (36070)
MALLORY SCHILLER (36191)
CODY N. BRANDON (037504)
DEAN S. ATYIA (039683)
Assistant Attorneys General
Law Enforcement and
Special Prosecutions Div.
P.O. Box 20207
Nashville, Tennessee 37202-0207
Off. (615) 532-6023
Fax (615) 532-4892

Robert.Mitchell@ag.tn.gov
Scott.Sutherland@ag.tn.gov
Miranda.Jones@ag.tn.gov
Mallory.Schiller@ag.tn.gov
Cody.BRANDON@ag.tn.gov
Dean.Atyia@ag.tn.gov

CERTIFICATE OF SERVICE

I certify that on May 3, 2022, a copy of the foregoing was filed and served via the Court's CM/ECF system on the following:

Alex Kursman
Lynne Leonard
Anastassia Baldridge
Hayden Nelson-Major
Assistant Federal Defenders
Federal Community Defender for the E.D.
Penn.
Suite 545 West, The Curtis
601 Walnut St.
Philadelphia, PA 19106
(215) 928-0520
alex_kursman@fd.org
lynne_leonard@fd.org
ana_baldridge@fd.org
hayden_nelson-major@fd.org

David Esquivel
Sarah Miller
Jeremy Gunn
Michael Tackeff

Bass, Berry & Sims 150 Third Ave. South
Nashville, TN 37201
(615) 742-6200
desquivel@bassberry.com
smiller@bassberry.com
jeremy.gunn@bassberry.com
michael.tackeff@bassberry.com

Alice Haston
Amy Rao Mohan
Christopher C. Sabis
Sherrard Roe Voight & Harbison, PLC
150 Third Ave. South
Suite 1100
Nashville, TN 37201
(615) 742-4539
ahaston@srvhlaw.com
amohan@srvhlaw.com
csabis@srvhlaw.com

s/ Rob Mitchell

ROB MITCHELL